

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

601 Lexington Avenue
New York, New York 10022

Joseph Serino Jr.
To Call Writer Directly:
(212) 446-4913
Joseph.serino@kirkland.com

(212) 446-4800
www.kirkland.com

Facsimile:
(212) 446-4900

June 15, 2015

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re Platinum and Palladium Antitrust Litigation*, 1:14-cv-09391(GHW)
(This document relates to all actions)

Dear Judge Woods,

I write on behalf of all parties in the above-captioned matter to request an expansion of the page limits for the defendants' motion to dismiss the Consolidated Amended Class Action Complaint, and the related opposition and reply papers. The plaintiffs and defendants jointly request leave to file briefs of the following page lengths:

- The London Platinum and Palladium Fixing Company ("LPPFC") member defendants (LPPFC, BASF Metals Ltd., Goldman Sachs International, HSBC Bank USA, N.A., and Standard Bank plc) propose to file a joint memorandum of law addressing common issues under Rule 12(b)(6). The parties request 50 pages for defendants' memorandum, 50 pages for plaintiffs' opposition, and 25 pages for defendants' reply.
- The UBS defendants (UBS AG and UBS Securities LLC) are differently situated, and propose to file a supplemental memorandum of law under Rule 12(b)(6). The parties request 15 pages for UBS to submit a memorandum of law, 15 pages for plaintiffs' opposition thereto, and 8 pages for UBS's reply.
- For any LPPFC member defendant who intends to file a supplemental memoranda of law addressing issues unique to it as to *both* Rule 12(b)(6) *and* Rule 12(b)(2) (personal jurisdiction), the parties request 12 pages for each such supplemental memorandum of law, 12 pages for plaintiffs' opposition to each such supplemental memorandum of law, and 5 pages for each defendant's reply; and for any LLPFC member defendant who intends to file a supplemental memoranda of law addressing

KIRKLAND & ELLIS LLP

Hon. Gregory H. Woods
June 15, 2015
Page 2

issues unique to it only to Rule 12(b)(6), and not Rule 12(b)(2), the parties request 5 pages for each such supplemental memorandum of law, 5 pages for plaintiffs' opposition to each such supplemental memorandum of law, and 2 pages for each defendant's reply

The parties thank the Court for its consideration of this joint request.

Respectfully submitted,

/s/ Joseph Serino

Joseph Serino, Jr., P.C.

cc: All Counsel of Record (via ECF)